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December 11, 2020

VIA ECF

Hon. Joel Schneider, U.S.M.J.
United States District Court for the District of New Jersey
Mitchell H. Cohen Building and U.S. Courthouse
4th and Cooper Streets
Camden, NJ 08101

Re: D. Kress v. Fulton Bank, N.A.
Civil Action No. 1:19-cv-18985-CDJ-JS

Dear Judge Schneider:

My firm represents Plaintiff in the above-referenced matter. With Defendant's consent, I write to request an extension of Plaintiff's deadline to file her Motion for Preliminary Approval of Collective and Class Action Settlement from December 13, 2020 to January 11, 2021. The proposed settlement is complex and resolves a hybrid collective and class action involving employees from several states. Plaintiff's counsel needs additional time to review and propose edits Defendant's drafts of documents to be filed along with Plaintiff's forthcoming motion and brief. The need for additional time is further necessitated by the fact that one of undersigned counsel's babysitters for his infant learned she had been exposed to covid-19 this past Wednesday, which has impacted childcare and undersigned counsel's ability to work on this matter. 

Respectfully Submitted,

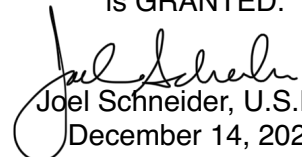
SWARTZ SWIDLER LLC

s/Matthew Miller

Matthew D. Miller, Esq. For good cause shown it is hereby
ORDERED the requested extension
is GRANTED.

Encl.

cc: Louisa Johnson, Esq., *counsel for Defendant, via ECF*
Robert Szyba, Esq., *counsel for Defendant, via ECF*


Joel Schneider, U.S.M.J.
December 14, 2020